

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA
ex rel. SAMANTHA GATES,
CURTIS MOORE, and
VANESSA PAWLAK,**

Plaintiffs,

v.

No. 4:19-cv-10941-SDD-DRG

CENTRIA HEALTHCARE, *et al.*,

Defendants.

**STIPULATION OF DISMISSAL OF CLAIMS OF RELATOR CURTIS MOORE
PURSUANT TO RULE 41(a)(1)(A)(ii)
OF THE FEDERAL RULES OF CIVIL PROCEDURE**

Pursuant to Rule 41(a)(1)(A)(ii) of the Fed. R. Civ. P., the Parties hereby stipulate and agree to the dismissal of any and all claims of Relator Curtis Moore. This dismissal is *with prejudice* as to Relator Moore only. The claims of Relators Samantha Gates and Vanessa Pawlak, including as relators to the United States, are unaffected.

A proposed order is submitted with this stipulation.

Dated: March 13, 2020

Respectfully submitted,

BROWN, LLC

THE HEALTH LAW PARTNERS

/s/ Patrick S. Almonrode
Patrick S. Almonrode
111 Town Square Place, Suite 400
Jersey City, NJ 07310
(877) 561-0000
patalmonrode@jtblawgroup.com

Attorneys for Relators

/s/
Clinton Mikel
32000 Northwestern, # 240
Farmington Hills, MI 48334
(248) 996-8510
cmikel@thehlp.com

Attorneys for Defendants

THE UNITED STATES' NOTICE OF CONSENT TO DISMISSAL

Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(1), the United States hereby notifies the Court that the Attorney General consents to the dismissal of this action with prejudice as to Relator Moore only.

The United States respectfully refers the Court to the Court's December 30, 2019 Order (ECF. No. 9), in which the Court stated that, "the Court will solicit the written consent of the United States before ruling or granting its approval" of any proposed dismissal, settlement or other discontinuation. (ECF. No 9 ¶ 7)

The United States requests that all other papers on file in this action currently under seal remain sealed because in discussing the content and extent of the United States' investigation, such papers are provided by law to the Court alone for the sole purpose of evaluating whether the seal and time for making an election to intervene should be extended.

Respectfully submitted,

MATTHEW SCHNEIDER
United States Attorney

/s/ Jonny Zajac
JONNY ZAJAC
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, Michigan 48226
(313) 226-0230
jonny.zajac@usdoj.gov
Illinois Bar No.: 6407383

Dated: March 9, 2020